

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF
GEORGIA ATLANTA DIVISION**

LILY ENGLEMAN,

Plaintiff,

V.

**WILLIAM CLAYTON NIX, JOHN
RICHEY, TOMEDIA JORDAN, MIKE
RILEY, and JONATHAN ADAMS,**

Defendants.

**CIVIL ACTION FILE
NO.: 1:22-cv-00903-MLB**

**DEFENDANT JONATHAN ADAMS' ANSWER AND DEFENSES TO
PLAINTIFF'S COMPLAINT**

COMES NOW, Jonathan Adams (hereinafter “Defendant Adams”), named as a Defendant in the above-styled action, and files this, his Answer and Defenses to Plaintiff’s Complaint, showing the Court as follows:

FIRST DEFENSE

Plaintiff's Complaint fails to state a claim against Defendant Adams upon which relief may be granted.

SECOND DEFENSE

Any alleged unlawful act or omission of Defendant Adams, his agents or employees, which alleged unlawful act or omission Defendant Adams specifically

denies, was not the proximate cause, but-for cause, or legal cause of any alleged damages or injury suffered as alleged in Plaintiff's Complaint.

THIRD DEFENSE

Defendant Adams is not liable to Plaintiff in any amount because Defendant Adams did not in any way deprive Plaintiff of any right, privilege or immunity secured by the Constitution of the United States, federal law, or state law, or as otherwise alleged in the Plaintiff's Complaint.

FOURTH DEFENSE

Defendant Adams asserts the defense of absolute immunity.

FIFTH DEFENSE

Plaintiff's Complaint is barred in whole and in part because Defendant Adams has not breached a legal duty.

SIXTH DEFENSE

Defendant Adams did not violate Plaintiff's rights under 42 U.S.C. § 1983 (hereinafter "§ 1983"), as alleged or otherwise and cannot be held liable under § 1983 for any actions involving Plaintiff in which he did not directly participate or of which he had no knowledge or over which he had no control.

SEVENTH DEFENSE

Defendant Adams asserts the defenses of Eleventh Amendment, quasi-

judicial, official, qualified, governmental, and sovereign immunity.

EIGHTH DEFENSE

For his Eighth Defense, Defendant Adams answers the enumerated paragraphs of Plaintiff's Complaint as follows:

PRELIMINARY STATEMENT

To the extent Plaintiff's Preliminary Statement contained in unnumbered preliminary section of Plaintiff's Complaint may be read to require a response, Defendant Adams denies that he violated Plaintiff's constitutional rights and denies Plaintiff is entitled to any recovery against Defendant Adams as alleged or otherwise.

PARTIES, JURISDICTION, AND VENUE

1.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One (1) of Plaintiff's Complaint and, therefore, denies same.

2.

Defendant Adams denies as pled the allegations contained in Paragraph Two (2) of Plaintiff's Complaint.

3.

Defendant Adams denies as pled the allegations contained in Paragraph Three (3) of Plaintiff's Complaint.

4.

Defendant Adams denies as pled the allegations contained in Paragraph Four (4) of Plaintiff's Complaint.

5.

Defendant Adams denies as pled the allegations contained in Paragraph Five (5) of Plaintiff's Complaint.

6.

Defendant Adams denies as pled the allegations contained in Paragraph Six (6) of Plaintiff's Complaint.

7.

The allegations contained in Paragraph Seven (7) of Plaintiff's Complaint set forth conclusions of law and, therefore, require no response from Defendant Adams. To the extent this Paragraph may be read to require a response from Defendant Adams, Defendant Adams denies the allegations of this Paragraph and further denies he violated Plaintiff's constitutional rights and denies Plaintiff is entitled to any recovery against Defendant Adams as alleged or otherwise.

8.

Defendant Adams denies as pled the allegations contained in Paragraph Eight (8) of Plaintiff's Complaint.

9.

Defendant Adams admits the allegations contained in Paragraph Nine (9) of Plaintiff's Complaint but denies venue is proper as to any claims against Defendant Adams.

FACTS

10.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Ten (10) of Plaintiff's Complaint and, therefore, denies same.

11.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Eleven (11) of Plaintiff's Complaint and, therefore, denies same.

12.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Twelve (12) of Plaintiff's Complaint and, therefore, denies same.

13.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Thirteen (13) of Plaintiff's Complaint and, therefore, denies same.

14.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Fourteen (14) of Plaintiff's Complaint and, therefore, denies same.

15.

The allegations contained in Paragraph Fifteen (15) of Plaintiff's Complaint set forth conclusions of law and, therefore, require no response from Defendant Adams. To the extent this Paragraph may be read to require a response from Defendant Adams, the referenced document(s) speaks for itself, and Defendant Adams denies any allegation contained in Paragraph Fifteen (15) of Plaintiff's Complaint which are inconsistent with the referenced document(s). As a further

response, Defendant Adams denies as pled any remaining allegations contained in this Paragraph and its subparts.

16.

Defendant Adams admits the allegations contained in Paragraph Sixteen (16) of Plaintiff's Complaint.

17.

Defendant Adams admits only that Dubose was charged with a felony crime but denies as pled the allegations contained in Paragraph Seventeen (17) of Plaintiff's Complaint.

18.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Eighteen (18) of Plaintiff's Complaint and, therefore, denies same.

19.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Nineteen (19) of Plaintiff's Complaint and, therefore, denies same.

20.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Twenty (20) of Plaintiff's Complaint and, therefore, denies same.

21.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Twenty-One (21) of Plaintiff's Complaint and, therefore, denies same.

22.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Twenty-Two (22) of Plaintiff's Complaint and, therefore, denies same.

23.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Twenty-Three (23) of Plaintiff's Complaint and, therefore, denies same.

24.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Twenty-Four (24) of Plaintiff's Complaint and, therefore, denies same.

25.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Twenty-Five (25) of Plaintiff's Complaint and, therefore, denies same.

26.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Twenty-Six (26) of Plaintiff's Complaint and, therefore, denies same.

27.

The referenced document(s) speaks for itself, and Defendant Adams denies any allegation contained in Paragraph Twenty-Seven (27) of Plaintiff's Complaint which are inconsistent with the referenced document(s). As a further response, Defendant Adams denies as pled any remaining allegations contained in this Paragraph.

28.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Twenty-Eight (28) of Plaintiff's Complaint and, therefore, denies same.

29.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Twenty-Nine (29) of Plaintiff's Complaint and, therefore, denies same.

30.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Thirty (30) of Plaintiff's Complaint and, therefore, denies same.

31.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Thirty-One (31) of Plaintiff's Complaint and, therefore, denies same.

32.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Thirty-Two (32) of Plaintiff's Complaint and, therefore, denies same.

33.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Thirty-Three (33) of Plaintiff's Complaint and, therefore, denies same.

34.

The allegations contained in Paragraph Thirty-Four (34) of Plaintiff's Complaint set forth conclusions of law and, therefore, require no response from Defendant Adams. To the extent this Paragraph may be read to require a response from Defendant Adams, the referenced document(s) speaks for itself, and Defendant Adams denies any allegation contained in Paragraph Thirty-Four (34) of Plaintiff's Complaint which are inconsistent with the referenced document(s). As a further response, Defendant Adams denies as pled any remaining allegations contained in this Paragraph and its footnotes.

35.

The allegations contained in Paragraph Thirty-Five (35) of Plaintiff's Complaint set forth conclusions of law and, therefore, require no response from Defendant Adams. To the extent this Paragraph may be read to require a response from Defendant Adams, the referenced document(s) speaks for itself, and Defendant Adams denies any allegation contained in Paragraph Thirty-Five (35) of Plaintiff's Complaint which are inconsistent with the referenced document(s). As a further response, Defendant Adams denies as pled any remaining allegations contained in this Paragraph and its footnotes.

36.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Thirty-Six (36) of Plaintiff's Complaint and, therefore, denies same.

37.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Thirty-Seven (37) of Plaintiff's Complaint and, therefore, denies same.

38.

The referenced document(s) speaks for itself, and Defendant Adams denies any allegation contained in Paragraph Thirty-Eight (38) of Plaintiff's Complaint which are inconsistent with the referenced document(s). As a further response, Defendant Adams denies as pled any remaining allegations contained in this Paragraph.

39.

The referenced document(s) speaks for itself, and Defendant Adams denies any allegation contained in Paragraph Thirty-Nine (39) of Plaintiff's Complaint which are inconsistent with the referenced document(s). As a further response, Defendant Adams denies as pled any remaining allegations contained in this Paragraph.

40.

The referenced document(s) speaks for itself, and Defendant Adams denies any allegation contained in Paragraph Forty (40) of Plaintiff's Complaint which are inconsistent with the referenced document(s). As a further response, Defendant Adams denies as pled any remaining allegations contained in this Paragraph.

41.

The referenced document(s) speaks for itself, and Defendant Adams denies any allegation contained in Paragraph Forty-One (41) of Plaintiff's Complaint which are inconsistent with the referenced document(s). As a further response, Defendant Adams denies as pled any remaining allegations contained in this Paragraph.

42.

Defendant Adams denies as pled the allegations contained in Paragraph Forty-Two (42) of Plaintiff's Complaint.

43.

Defendant Adams denies as pled the allegations contained in Paragraph Forty-Three (43) of Plaintiff's Complaint.

44.

Defendant Adams denies as pled the allegations contained in Paragraph Forty-Four (44) of Plaintiff's Complaint.

45.

The referenced document(s) speaks for itself, and Defendant Adams denies any allegation contained in Paragraph Forty-Five (45) of Plaintiff's Complaint which are inconsistent with the referenced document(s). As a further response, Defendant Adams denies as pled any remaining allegations contained in this Paragraph.

46.

The referenced document(s) speaks for itself, and Defendant Adams denies any allegation contained in Paragraph Forty-Six (46) of Plaintiff's Complaint which are inconsistent with the referenced document(s). As a further response, Defendant Adams denies as pled any remaining allegations contained in this Paragraph.

47.

Defendant Adams denies as pled the allegations contained in Paragraph Forty-Seven (47) of Plaintiff's Complaint.

48.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Forty-Eight (48) of Plaintiff's Complaint and, therefore, denies same.

49.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Forty-Nine (49) of Plaintiff's Complaint and, therefore, denies same.

50.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Fifty (50) of Plaintiff's Complaint and, therefore, denies same.

51.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Fifty-One (1) of Plaintiff's Complaint and, therefore, denies same.

52.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Fifty-Two (52) of Plaintiff's Complaint and, therefore, denies same.

53.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Fifty-Three (53) of Plaintiff's Complaint and, therefore, denies same.

54.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Fifty-Four (54) of Plaintiff's Complaint and, therefore, denies same.

55.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Fifty-Five (55) of Plaintiff's Complaint and, therefore, denies same.

56.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Fifty-Six (56) of Plaintiff's Complaint and, therefore, denies same.

57.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Fifty-Seven (57) of Plaintiff's Complaint and, therefore, denies same.

58.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Fifty-Eight (58) of Plaintiff's Complaint and, therefore, denies same.

59.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Fifty-Nine (59) of Plaintiff's Complaint and, therefore, denies same.

60.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Sixty (60) of Plaintiff's Complaint and, therefore, denies same.

61.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Sixty-One (61) of Plaintiff's Complaint and, therefore, denies same.

62.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Sixty-Two (62) of Plaintiff's Complaint and, therefore, denies same.

63.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Sixty-Three (63) of Plaintiff's Complaint and, therefore, denies same.

64.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Sixty-Four (64) of Plaintiff's Complaint and, therefore, denies same.

65.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Sixty-Five (65) of Plaintiff's Complaint and, therefore, denies same.

66.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Sixty-Six (66) of Plaintiff's Complaint and, therefore, denies same.

67.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Sixty-Seven (67) of Plaintiff's Complaint and, therefore, denies same.

68.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Sixty-Eight (68) of Plaintiff's Complaint and, therefore, denies same.

69.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Sixty-Nine (69) of Plaintiff's Complaint and, therefore, denies same.

70.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Seventy (70) of Plaintiff's Complaint and, therefore, denies same.

71.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Seventy-One (71) of Plaintiff's Complaint and, therefore, denies same.

72.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Seventy-Two (72) of Plaintiff's Complaint and, therefore, denies same.

73.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Seventy-Three (73) of Plaintiff's Complaint and, therefore, denies same.

74.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Seventy-Four (74) of Plaintiff's Complaint and, therefore, denies same.

75.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Seventy-Five (75) of Plaintiff's Complaint and, therefore, denies same.

76.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Seventy-Six (76) of Plaintiff's Complaint and, therefore, denies same.

77.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Seventy-Seven (77) of Plaintiff's Complaint and, therefore, denies same.

78.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Seventy-Eight (78) of Plaintiff's Complaint and, therefore, denies same.

79.

Defendant Adams denies the allegations contained in Paragraph Seventy-Nine (79) of Plaintiff's Complaint.

80.

Defendant Adams denies the allegations contained in Paragraph Eighty (80) of Plaintiff's Complaint.

81.

The referenced document(s) speaks for itself, and Defendant Adams denies any allegation contained in Paragraph Eighty-One (81) of Plaintiff's Complaint which are inconsistent with the referenced document(s). As a further response, Defendant Adams denies as pled any allegations contained in this Paragraph of Plaintiff's Complaint.

82.

Defendant Adams denies as pled the allegations contained in Paragraph Eighty-Two (82) of Plaintiff's Complaint.

83.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Eighty-Three (83) of Plaintiff's Complaint and, therefore, denies same.

84.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Eighty-Four (84) of Plaintiff's Complaint and, therefore, denies same.

85.

Defendant Adams denies as pled the allegations contained in Paragraph Eighty-Five (85) of Plaintiff's Complaint.

86.

Defendant Adams admits the allegations contained in Paragraph Eighty-Six (86) of Plaintiff's Complaint.

87.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Eighty-Seven (87) of Plaintiff's Complaint and, therefore, denies same.

88.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Eighty-Eight (88) of Plaintiff's Complaint and, therefore, denies same.

89.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Eighty-Nine (89) of Plaintiff's Complaint and, therefore, denies same.

90.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Ninety (90) of Plaintiff's Complaint and, therefore, denies same.

91.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Ninety-One (91) of Plaintiff's Complaint and, therefore, denies same.

92.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Ninety-Two (92) of Plaintiff's Complaint and, therefore, denies same.

93.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Ninety-Three (93) of Plaintiff's Complaint and, therefore, denies same.

94.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Ninety-Four (94) of Plaintiff's Complaint and, therefore, denies same.

95.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Ninety-Five (95) of Plaintiff's Complaint and, therefore, denies same.

96.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Ninety-Six (96) of Plaintiff's Complaint and, therefore, denies same.

97.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Ninety-Seven (97) of Plaintiff's Complaint and, therefore, denies same.

98.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Ninety-Eight (98) of Plaintiff's Complaint and, therefore, denies same.

99.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Ninety-Nine (99) of Plaintiff's Complaint and, therefore, denies same.

100.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One Hundred (100) of Plaintiff's Complaint and, therefore, denies same.

101.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One Hundred-One (101) of Plaintiff's Complaint and, therefore, denies same.

102.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One Hundred-Two (102) of Plaintiff's Complaint and, therefore, denies same.

103.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One Hundred-Three (103) of Plaintiff's Complaint and, therefore, denies same.

104.

Defendant Adams denies as pled the allegations contained in Paragraph One Hundred-Four (104) of Plaintiff's Complaint.

105.

Defendant Adams denies as pled the allegations contained in Paragraph One Hundred-Five (105) of Plaintiff's Complaint.

106.

Defendant Adams denies as pled the allegations contained in Paragraph One Hundred-Six (106) of Plaintiff's Complaint.

107.

Defendant Adams admits only that he exercised his discretion and elected to terminate prosecution of the crimes true billed by the grand jury. As a further response, Defendant Adams denies as pled the allegations contained in Paragraph One Hundred-Seven (107) of Plaintiff's Complaint.

108.

Defendant Adams denies the allegations contained in Paragraph One Hundred-Eight (108) of Plaintiff's Complaint.

COUNT I

109.

Defendant Adams denies the allegations contained in Paragraph One Hundred-Nine (109) of Plaintiff's Complaint.

110.

The allegations contained in Paragraph One Hundred-Ten (110) of Plaintiff's Complaint set forth conclusions of law and, therefore, require no response from Defendant Adams. To the extent this Paragraph may be read to require a response from Defendant Adams, Defendant Adams denies that he violated Plaintiff's constitutional rights and denies Plaintiff is entitled to any recovery against Defendant Adams as alleged or otherwise.

111.

The allegations contained in Paragraph One Hundred-Eleven (111) of Plaintiff's Complaint set forth conclusions of law and, therefore, require no response from Defendant Adams. To the extent this Paragraph may be read to require a response from Defendant Adams, Defendant Adams denies that he violated

Plaintiff's constitutional rights and denies Plaintiff is entitled to any recovery against Defendant Adams as alleged or otherwise.

112.

Defendant Adams denies the allegations contained in Paragraph One Hundred-Twelve (112) of Plaintiff's Complaint.

113.

Defendant Adams denies the allegations contained in Paragraph One Hundred-Thirteen (113) of Plaintiff's Complaint.

114.

The referenced document(s) speaks for itself, and Defendant Adams denies any allegation contained in Paragraph One Hundred-Fourteen (114) of Plaintiff's Complaint which are inconsistent with the referenced document(s). As a further response, Defendant Adams denies as pled any remaining allegations contained in this Paragraph.

115.

The referenced video(s) speaks for itself, and Defendant Adams denies any allegation contained in Paragraph One Hundred-Fifteen (115) of Plaintiff's Complaint which are inconsistent with the referenced document video(s). As a

further response, Defendant Adams denies as pled any remaining allegations contained in this Paragraph.

116.

Defendant Adams denies the allegations contained in Paragraph One Hundred-Sixteen (116) of Plaintiff's Complaint.

117.

Defendant Adams denies the allegations contained in Paragraph One Hundred-Seventeen (117) of Plaintiff's Complaint.

118.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One Hundred-Eighteen (118) of Plaintiff's Complaint and, therefore, denies same.

119.

Defendant Adams denies the allegations contained in Paragraph One Hundred-Nineteen (119) of Plaintiff's Complaint.

120.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One Hundred-Twenty (120) of Plaintiff's Complaint and, therefore, denies same.

121.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One Hundred-Twenty-One (121) of Plaintiff's Complaint and, therefore, denies same.

122.

Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One Hundred-Twenty-Two (122) of Plaintiff's Complaint and, therefore, denies same.

123.

Defendant Adams denies the allegations contained in Paragraph One Hundred-Twenty-Three (123) of Plaintiff's Complaint.

124.

Defendant Adams denies the allegations contained in Paragraph One Hundred-Twenty-Four (124) of Plaintiff's Complaint. As a further response, Defendant Adams points out that in this Paragraph, like many others in Plaintiff's Complaint, Plaintiff misstates the law and seeks to impose burdens beyond and other than those which apply.

125.

Defendant Adams denies the allegations contained in Paragraph One Hundred-Twenty-Five (125) of Plaintiff's Complaint.

126.

Defendant Adams denies the allegations contained in Paragraph One Hundred-Twenty-Six (126) of Plaintiff's Complaint.

127.

Defendant Adams denies the allegations contained in Paragraph One Hundred-Twenty-Seven (127) of Plaintiff's Complaint.

128.

Defendant Adams denies the allegations contained in Paragraph One Hundred-Twenty-Eight (128) of Plaintiff's Complaint.

COUNT II

129.

Paragraph One Hundred-Twenty-Nine (129) of Plaintiff's Complaint does not require a response from Defendant Adams. To the extent it may be read to require a response from Defendant Adams, Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in

Paragraph One Hundred-Twenty-Nine (129) of Plaintiff's Complaint and, therefore, denies same.

130.

Paragraph One Hundred-Thirty (130) of Plaintiff's Complaint does not require a response from Defendant Adams. To the extent it may be read to require a response from Defendant Adams, Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One Hundred-Thirty (130) of Plaintiff's Complaint and, therefore, denies same.

131.

Paragraph One Hundred-Thirty-One (131) of Plaintiff's Complaint does not require a response from Defendant Adams. To the extent it may be read to require a response from Defendant Adams, Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One Hundred-Thirty-One (131) of Plaintiff's Complaint and, therefore, denies same.

132.

Paragraph One Hundred-Thirty-Two (132) of Plaintiff's Complaint does not require a response from Defendant Adams. To the extent it may be read to require a

response from Defendant Adams, Defendant Adams is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One Hundred-Thirty-Two (132) of Plaintiff's Complaint and, therefore, denies same.

133.

To the extent Plaintiff's Prayer for Relief may be read to require a response, Defendant Adams denies that Plaintiff is entitled to any recovery against Defendant Adams as alleged or otherwise.

134.

Any allegation set forth in Plaintiff's Complaint which is not specifically responded to hereinabove is hereby denied.

WHEREFORE, having fully responded to Plaintiff's Complaint, Defendant Adams prays that the Court inquire into this matter and dismiss Plaintiff's Complaint casting all costs upon Plaintiff and prays for grant such other relief as the Court deems justice to demand.

This 28th day of April, 2022.

Respectfully submitted¹,

¹ Counsel for Defendant Adams hereby certifies that this pleading was prepared in Times New Roman font, 14 point, in compliance with Local Rule 5.1(C).

BUCKLEY CHRISTOPHER, P.C.

/s/ Timothy J. Buckley III

TIMOTHY J. BUCKLEY III

Georgia State Bar No. 092913

ERIC J. O'BRIEN

Georgia State Bar No. 383745

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DEFENDANT ADAMS DEMAND TRIAL BY JURY OF TWELVE

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF
GEORGIA ATLANTA DIVISION**

LILY ENGLEMAN,

Plaintiff,

V.

**WILLIAM CLAYTON NIX, JOHN
RICHEY, TOMEDIA JORDAN, MIKE
RILEY, and JONATHAN ADAMS,**

Defendants.

**CIVIL ACTION FILE
NO.: 1:22-cv-00903-MLB**

CERTIFICATE OF SERVICE

I hereby certify that on April 28, 2022, I served DEFENDANT JONATHAN ADAMS' ANSWER AND DEFENSES TO PLAINTIFF'S COMPLAINT via email and electronically filed this CERTIFICATE OF SERVICE using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

BUCKLEY CHRISTOPHER, P.C.

/s/ Timothy J. Buckley III
TIMOTHY J. BUCKLEY III
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ERIC J. O'BRIEN
Georgia State Bar No. 383745
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